

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	Case No. 19-24636-GLT
Jerome Donald Boyd,	:	
Debtor	:	Chapter 13
_____	:	
	:	
Jerome Donald Boyd,	:	Claim. No. 3
Movant	:	
	:	
v.	:	Hearing Date:
	:	
	:	
Nationstar Mortgage LLC d/b/a Mr. Cooper and	:	
Ronda Winnecour, Trustee	:	
Respondents	:	
_____	:	

**DECLARATION**

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to Nationstar Mortgage LLC d/b/a Mr. Cooper's Notice of Mortgage Payment Change dated November 5, 2021, the Debtor's current escrow payment for account number ending in **2205** is **\$698.55**. The new escrow payment is **\$678.06**. The new total mortgage payment is **\$1,837.61** effective December 1, 2021. The Debtor will make the mortgage/escrow shortage of **\$60.61** in addition to his regular monthly Chapter 13 mortgage payment of **\$1,777.00**.

Dated: **November 19, 2021**

Respectfully submitted by:  
**/s/ Jerome Donald Boyd**  
**Jerome Donald Boyd**

Dated: **November 19, 2021**

Respectfully submitted by:  
**/s/ Albert G. Reese, Jr., Esquire**  
Albert G. Reese, Jr., Esquire  
PA ID #93813  
640 Rodi Road, 2<sup>nd</sup> Floor, Suite 2  
Pittsburgh, PA 15235  
(412) 241-1697  
(412) 241-1687(fax)  
[areese8897@aol.com](mailto:areese8897@aol.com)  
Attorney for Debtor